

PL IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**JOINT STIPULATED MOTION
TO EXTEND DEADLINES**

COME NOW Plaintiffs Jane Doe 1 and Jane Doe 2, and Defendant by and through their respective undersigned counsel, and request that the following deadlines be extended:

1. The deadlines for identifying and providing complete expert disclosures for all experts expected to testify at trial, (both retained experts, (Fed. R. Civ. P. 26(a)(2)(B)), and non-retained experts, (Fed. R. Civ. P. 26(a)(2)(C)), be extended from June 30, 2023, to **September 28, 2023**, for the defendant(s).
2. Deadline for completing written discovery under Rules 33, 34, 36 and 45 of the Federal Rules of Civil Procedure be extended from July 30, 2023, to **October 27, 2023**. Deadline to file motions to compel written discovery under Rules 33, 34, 36 and 45 be extended from August 30, 2023, to **November 28, 2023**.
3. The deposition deadline, including but not limited to depositions for oral testimony only under Rule 45 be extended from September 30, 2023, to **December 15, 2023**.
4. The deadline for filing motions to dismiss and motions for summary judgment be extended from January 31, 2024, to **February 28, 2024**.
5. The deadline for filing motions to exclude testimony on Daubert and related grounds be extended from September 30, 2023, to **April 30, 2024**.
6. The parties are working diligently to comply with all of the Court deadlines. The parties have been and continue to be actively engaged with written discovery. The

extension of the above deadlines will allow the parties sufficient time to discover the facts at issue in this case. The enlargement of time requested will not cause any undue hardship or prejudice to any party.

WHEREFORE, Plaintiffs and Defendant respectfully request that this Court extend the above deadline as requested herein.

DATED this 30th day of June, 2023.

JANE DOE 1 AND JANE DOE 2, Plaintiffs

By: s/Karen Truszkowski
Karen Truszkowski
TEMPERANCE LEGAL GROUP, PLLC
503 Mall Court #131
Lansing, MI 48912
(844) 534-2560
karen@temperancelegalgroup.com

AND

Elizabeth K. Abdour (P78203)
ABDNOUR WEIKER LLP
Attorney for Plaintiff
500 E. Michigan Ave., Ste. 130
Lansing, MI 48912
Phone: (517) 994-1776
Fax: (614) 417-5081
liz@education-rights.com

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA, Defendant

By: /s/ Lily Amare
Susan K. Sapp #19121
Lily Amare #25735
Cline Williams Wright
Johnson & Oldfather, L.L.P.
1900 U.S. Bank Building
233 South 13th Street
Lincoln, NE 68508
(402) 474-6900
ssapp@clinewilliams.com
lamare@clinewilliams.com

AND

Bren H. Chambers, #23150
Associate General Counsel
University of Nebraska
3835 Holdrege Street
Lincoln, NE 68583-0745
402-472-1201
bchambers@nebraska.edu

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

Karen Truszkowski
TEMPERANCE LEGAL GROUP, PLLC
503 Mall Court #131
Lansing, MI 48912
karen@temperancelegalgroup.com

Elizabeth K. Abdour
ABDNOUR WEIKER LLP
500 E. Michigan Ave., Ste. 130
Lansing, MI 48912
liz@education-rights.com

/s/ Lily Amare
Lily Amare